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(*additional counsel on Exhibit A*)

9 *Local Bankruptcy Counsel to Securities Lead  
Plaintiff and the Class*

11 **UNITED STATES BANKRUPTCY COURT**

12 **NORTHERN DISTRICT OF CALIFORNIA**

14 In re:

15 PG&E CORPORATION,

16 - and -

17 PACIFIC GAS AND ELECTRIC COMPANY,

18 Reorganized Debtors.

19 ☐ Affects PG&E Corporation

20 ☐ Affects Pacific Gas and Electric Company

21 ☒ Affects both Debtors

22 \* All papers shall be filed in the Lead Case,  
23 No. 19-30088 (DM).

Case No. 19-30088 (DM) (Lead Case)  
Chapter 11  
(Jointly Administered)

**SECURITIES PLAINTIFFS' PRE-  
HEARING STATEMENT**

Date: December 19, 2023

Time: 10:00 a.m. (PT)

Before: (Telephonic Appearances Only)  
United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, California 94102

1 Proposed Lead Plaintiff Public Employees Retirement Association of New Mexico  
2 (“PERA”) hereby submits this pre-hearing statement for the December 19, 2023 hearing before the  
3 Court, where the Court will set the briefing schedule for Reorganized Debtors’ objection to PERA’s  
4 proofs of claim [Dkt. No. 14200].

5 PERA agrees with Baupost [*see* Dkt. No. 14225] that the Court should grant Securities  
6 Claimants<sup>1</sup> at least 90 days to respond to Reorganized Debtors’ objections—*i.e.*, until March 12,  
7 2024—in light of the length and scope of those objections, the documents submitted in support of  
8 those objections (consisting of approximately 4,500 pages), and the need for discovery. However,  
9 the actual response deadline date will depend upon whether the parties can coordinate and complete  
10 discovery within such 90-day timeframe. PERA proposes that the parties should continue to meet  
11 and confer and propose a joint schedule for discovery.

12 Separately, the Ninth Circuit Court of Appeals has not yet issued a decision regarding the  
13 stay order in the related proceedings in the District Court styled *In re PG&E Corp. Secs. Litig.*, No.  
14 3:18-cv-03509-EJD (N.D. Cal.). Accordingly, PERA does not presently intend to move under 28  
15 U.S.C. § 157(d) to withdraw the reference from this Court with respect to the  
16 objections/sufficiency motions. However, PERA reserves all of its rights concerning a potential  
17 motion to withdraw the reference once the Ninth Circuit Court of Appeals issues its decision.

18  
19 Dated: December 18, 2023

20 Respectfully submitted,

21 **LABATON SUCHAROW LLP**

22 By: /s/ Thomas A. Dubbs  
23 Thomas A. Dubbs (*pro hac vice*)  
24 Lead Counsel to Securities Lead  
Plaintiff and the Class

25 - and –

26 **MICHELSON LAW GROUP**

27  
28 <sup>1</sup> For the avoidance of doubt, any response deadline established by the Court should also be  
applicable to the Securities Act Plaintiffs that have filed Securities Claims.

1  
2 By: /s/ Randy Michelson  
3 Randy Michelson (SBN 114095)  
4 *Local Bankruptcy Counsel to Securities Lead*  
5 *Plaintiff and the Class*

6 - and -

7 **LOWENSTEIN SANDLER LLP**  
8 *Special Bankruptcy Counsel to Securities Lead*  
9 *Plaintiff and the Class*

10 - and -

11 **WAGSTAFFE, VON LOEWENFELDT, BUSCH**  
12 **& RADWICK, LLP**  
13 *Liaison Counsel for the Class*

14 - and -

15 **ROBBINS GELLER RUDMAN & DOWD LLP**  
16 *Counsel for the Securities Act Plaintiffs*

17 - and -

18 **VANOVERBEKE, MICHAUD & TIMMONY,**  
19 **P.C.**  
20 *Additional Counsel for the Securities Act Plaintiffs*

**EXHIBIT A**

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